WASTEX RESEARCH, INC.

July 11, 1983

Certified Mail No.: P 370 500 528

U.S. E.P.A.
R.C.R.A. Activities
Region V
P.O. Box A 3587
Chicago, IL 60690-3587

Attention: 5HW

Subject: Part B Permit Application, ILD 980700744

Gentlemen:

Attached is the reply to the letter of May 17, 1983, from William H. Miner regarding the subject permit application. The only known deficiency remaining in the application is with regard to the liability insurance requirement. We have found it necessary to change insurance carriers for several reasons, one of which was our inability to obtain an originally signed copy of the endorsement with the wording specified under 264.151 (i), and the information required of the insurance carrier will be forthcoming in short order. The aggregate liability limit of this policy is also $5,000,000.00 which more than meets the requirements of 264.147 (a).

The delay in making this submission was unavoidable but was longer than anticipated. As noted in a telephone conversation with Mr. Robert Stone, the bulk of the response was completed and was to be submitted as requested in the letter of May 17, 1983, but it then appeared that a short delay would allow submission of all of the response. Such was not the case. We would hope that the submission of a more complete response will help in review of the application.

Should additional information or clarification be necessary, please contact my office or that of Joe D. Burroughs, Environmental Engineer.

2000 Broadway • East St. Louis, Illinois 62205 • (618) 271-2372

I. Topographic Map

(a) The information required at 40CFR122.25(a)(19) is already shown on existing maps or drawings or is better shown on other maps and drawings. It does not appear feasible to duplicate that information on a single topographic map. The review of the information submitted in this manner is understandably more difficult but the increased accuracy and drawing clarity provide the items of detail in a manner that provides a better definition of the facility and the surrounding area that may be affected by the facility operation. Drawing P-7 is prepared to better show the land use of the area within 1,000 feet of the facility.

(b) Two ground water withdrawl wells exist on-site and are shown on Drawing P-5 previously submitted. Information from the Illinois State Geological Survey Division,. Ms. Ann Faber, indicated that they have record of two other wells that could be within 1,000 feet of the facility. The one well was shown as being installed by Certainteed in 1942 in the section in which the facility is located (section 19 of T2N, R9W of St. Clair County) and the other in 1954 in the section to the west (section 24 of T2N, R10W). Information from John Corder, owner of Corder Equipment Co. which operates on the site of the former Certainteed facility, indicates that Certainteed used the wells for process water until they closed the asphalt roofing production facility in 1980, obtaining approximately 3 MGD of their 6 MGD usage from that source. A site visit by a member of the Wastex staff confirmed the presence of the wells and located the closest well approximately 50 feet off the centerline of 18th Street and the other approximately 75 feet further inside the facility. An estimate of the distance of the wells from the Wastex property line is 800 and 875 feet. These two wells are not currently in

use but appear to be in an operable condition. The area is adequately serviced by Ill-American Water Company for potable water and their use for such a purpose would not be anticipated. The two wells on the Certainteed site are shown on Drawing P-7.

(c) Drawing P5, as currently revised, and the information shown thereon is the most current plan of use for the facility.

(d) All storm sewers known to exist within the facility have been added to Drawing P5 under revision 2.

(e) The land disposal unit and surface impoundment referred to in the Part A application have been replaced by a filter press and a wastewater treatment system. This process will be discussed in detail elsewhere in this submission.

(f) Requirements for the Part B permit application have been reviewed and it is our determination that all such requirements applicable will be met by this submission and those made earlier.

(g) Hazardous waste management units within the facility are shown on Drawing P5.

II. (a) The nearest major highway providing access to the site is Illinois Route 15. The shortest route to that highway and the one used is to procede northwest on Broadway Avenue to Eighteenth Street and then northeast on Eighteenth Street to Illinois Route 15. There are fourway stop signs at the intersection of Broadway with Eighteenth and traffic control lights at the intersection of Eighteenth with Illinois Route 15. Left turn lanes and signals are provided for traffic exiting Illinois route 15 onto Eighteenth. The section

of Broadway so used is concrete with the section of Eighteenth being asphaltic concrete over brick paving. There are curbs and gutters on both streets. This information and the load bearing capacities are noted on revised Plate 12 attached.

III. (a) The waste analysis table lists those waste streams which will be handled by the facility by hazardous waste number, the analyses to be performed on each waste stream, and the range of values expected for those analyses. We have also added to this list the parameters which are of concern for any potential wastewater discharge and those of concern for the fuel product.

IV. (a) Compatibility between waste and container will be of concern only when the waste is highly acidic or alkaline. All other wastes are compatile with the steel drums and tanks used for transporting and storing the waste or with the polypropylene lined drums used periodicaly. Wastes that are classified as hazardous due to corrosivity (D002) and those wastes listed due to other characteristics but also exhibiting corrosive characteristics and received in drums of non-compatible material will be transfered to glasslined tankage or drums made of a compatible materials, or lined with a compatible material, within 72 hours of unloading, normally within 24 hours. Drums containing corrosive material not compatible with that material will not be placed in a storage area Alkaline, acidic, and flammable materials will be stored in different areas and each such area will be discrete and have secondary containment to assure retention of spills within that area away from any non-compatible waste.

(b) Reference to physical state is made with regard to

261.2 (b) and is for information purposes only. This information is necessary and we feel the terminology the same as that used in the regulations. In the submittal of January 12, 1983, the information is entered under Waste Properties as shown on page 89.

(c) The parameters mentioned on page 85 of the January 12, 1983, submission are those considered of prime importance in the use of liquid hazardous waste for fuel blending which is the only process fully permitted for operation by the Illinois E.P.A. The opportunity of requesting further analytical information under the Waste Composition section of the form will provide for the required data to be submitted.

(d) The test methods for the parameters noted and which will be determined are:

nickle	-	EPA 249.1
acidity	-	EPA 305.1
alkalinity	-	EPA 310.1
viscosity	-	ASTM D88 Part 15 & 40
Total Suspended Solids	-	EPA 160.2
Volatile " "	-	EPA 160.4
water	-	ASTM E203 Part 30
COD	-	EPA 410.1
BOD5	-	EPA 405.1
sulfur	-	ASTM D129 Part 23 & 40
ash content	-	EPA 160.4
density	-	ASTM D1298 Part 23 & 40
BTU content	-	ASTM E711 Part 41

(e) BTU content where actually measured will be as noted above, Estimation of he BTU content allows Wastex to make a preliminary determination regarding use of the waste in the fuel blending process.

(f) The sampling methods to be used will be those specified under Appendix I of Part 261. To date a need for exceptions to these procedures has not been determined.

(g) Random sampling appears to be the most effective method of derermining the material to be sampled. If sampling is accomplished on a certain frequency the possibility of not sampling a non-complying material is greatly increased. By varying the period between sampling and also maintaining a minimum frequency of analysis the analytical information so derived is much more indicative of the material actually received at the facility. As discussed in the Waste Analysis Plan, page 76 of the January 12, 1983, submission, at least one of every ten shipments of a particular waste stream will be sampled for a full analysis. Provisions for accelerating the frequency of analysis are also discussed at that point.

Scheduling of an analysis will be done prior to receipt of a shipment and without letting the generator or transporter know of that determination. The analytical results will be provided to the generator.

(h) The review of physical characteristics of wastes received at the facility is a subjective evaluation of the material based upon the knowledge available to the individual of previous shipments of that waste stream and of similar waste streams. Additional information regarding a particular waste stream will be provided by a reserved sample of that waste stream that has been analyzed and det

mined to be representative of the material to be received. An objective evaluation will be made by the use of a fingerprint type laboratory analysis. A sample from each drum will be taken using a Coliwasa type sampler and from bulk shipments using a weighted bottle sampler. For waste streams under D001, F001, F002, F003, and F005 the fingerprint analysis will be by gas chromatograph using a thermal conductivity detector. For the other waste streams a laboratory pH will be determined. Sampler from drums having similar physical characteristics, from the same waste stream, will be composited for the fingerprint analysis. Any drum or drums which have different physical characteristics will be similarly composited and a seperate fingerprint analysis performed. Should any fingerprint analysis not show a result in the range of values to be expected for that waste stream a complete analysis as specified in the Waste Analysis Plan will be performed.

Sludges and solids will be sampled using a similar procedure except that sludges will be sampled using a trier, moist solids using a trier. and dry solids using a thief.

V. (a) Subpart F of 49 CFR 173 requires that drums used to ship corrosive materials, such as will be accepted by Wastex, must meet DOT specifications 5A, 5B, 17C, 17E, or 17F for unlined steel drums, 5C for stainless steel drums, 5M for monel drums, or 6D or 37 for steel drums with liners and 2S, 2SL, or 24 for the polyethylene liners. Any drum received at the facility containing corrosive hazardous waste will be transferred to a

container meeting the applicable requirements or placed in a polyethylene protective overpack.

(b) The only unlined metal drums which will be placed in storage containing corrosive hazardous wastes will be those meeting DOT specifications 5C (stainless steel) or 5M (monel). These materials are relatively impervious to attack by any corrosive hazardous waste to be received in drums by the facility.

(c) All employees, supervisory and hourly, will be instructed in the proper handling of drums containing hazardous waste. This will be accomplished in the training program and in the frequent safety meetings.

(d) The existing concrete floors in the storage areas will be retained and any cracks or expansion points will be cleaned and sealed.

1. The sealant for cracks or expansion joints will be a hydraulic cement/epoxy mixture. The steel barriers to be added for secondary containment will be anchored to the floor with a rubber gasket between the steel base and concrete. Any joints in the containment barrier will be sealed with rubber gaskets and/or epoxy based caulking as necessary.

2. Sealing of the floors will depend upon approval of the procedures by issuance of the Part B permit. The sealing will be initiated within 30 days after permit issuance and no hazardous waste will be stored in a containment in which the floor has not been sealed. As the floor in a secondary containment area is completely sealed,

that area will be used to the maximum extent possible for the storage of compatible hazardous waste to minimize the storage of wastes in incompletely sealed areas.

3. All basements in buildings used for the storage of hazardous waste are noted on the revised drawing P5 enclosed with this submission. The hazardous waste storage areas or other areas with secondary containment include no floor areas over basements or tunnels.

(e) 1. The storage pattern for drums of hazardous waste considered most appropriate by Wastex personnel to allow easy access to any leaking drums, to provide a method minimizing hazards for employees, and to make good use of the available space is to place the drums 20 wide by 4 deep by 3 high. Lift truck access is provided along the width on each side and a walkway at each end.

2. Removal of spilled material will be completed prior to the end of the operating shift if reported during that shift and prior to the end of the next operating if the spill is reported on an off-shift. If the spill is a significant spill involving a quantity greater than one drum the cleanup will be initiated within 2 hours regardless of the time reported.

3. The absorbent material and tools necessary for spill cleanup are maintained in the maintenance room in Building 17. Additional quantities of absorbent will be available from the bulk storage tanks of dry reagents or the fixation/solidification process. During a normal operating shift a minimum of 12 people will be available to assist in spill cleanups as necessary. All employees are subject

to assignment or call to assist in spill cleanup.

(f) The retention capacity of each secondary containment unit is noted on drawing P5. Each of these units will have a minimum containment depth of six inches with the curbing currently in place and the structures to be added. The units are as follows with the retention capacity and the storage thereby allowed by 264.175 (b) (3):

	Retention Capacity	Drum Capacity
Building 3	42,000 gal	7,636
Building 6-Nonflammable	32,625 "	5,931
-Flammable	37,125 "	6,750
Building 16	40,500 "	7,363
Building 22	24,980 "	4.541
Building 31	44,625 "	8,113
Building 38-First floor	35,155 "	6,391
-Second floor	22,500 "	4,090

(g) Run-on of surface liquids into drum storage areas has not been observed at the facility. Any accumulation of liquids has been the result of wind blown rain entering the building during severe precipitation events through doorways or windows or from minor roof leaks in the buildings. The windows and doors will remain open under our storage plan to assure adequate ventilation to preclude the accumulation of fumes or vapors in the storage areas. Major roof leaks have been halted over areas that will be used for drum storage and all other leaks will be repaired as soon as financial resources are available.

(h) Any accumulation of standing liquids in the secondary containment areas will be removed by the use of absorbent materials prior to the end of the next operating shift after the accumulation is reported. The same personnel, equipment, and supplies will be used for the

removal of accumulated liquid as are used for spill cleanups.

VI. (a) The acid/alkaline mixing tank and tanks HT1 and HT2 were not added to the storage tank listing as they are considered as process vessels. That listing has been revised to include those tanks and the revised listing is enclosed.

(b) Degradation of the storage tanks by corrosion, erosion, or abrasion is not expected to occur such that the inspection schedule would not discover such degradation before a failure could occur. The flammable hazardous waste liquids are compatible with the steel tanks and any solids therein would be primarily organic and not a source of erosion or abrasion. The tanks to be used for corrosive liquid storage are glass-lined steel tanks and the inspections scheduled should detect any failures of the lining that could result in degredation of the shell. The process equipment tanks will be cleaned more often as required by Illinois E.P.A. and any significant degredation would be discovered in the check-out of the tanks at that time.

(c) The high level alarm set point will be at 95% of the volumetric capacity of each tank and each tank will be continuously monitored by the system. On the smallest tanks to be used, RST 8 and RST 9, 5% of the 10,500 gallon capacity, or 525 gallons, would be provided a freeboard. Transfer pumping will be with double diaphragm air operated pumps, Wilden model M-8 or M-15. The discharge head for the larger pump. the M-15, would be a minimum of 70 to 80 feet and using an air supply pressure of 110 psia a discharge of approximately 200 gpm would be provided. Should the high level alarm

sound the operator would have more than 2 1/2 minutes to respond. The operator will be stationed in the immediate area of the pump and in no case will that operator be more than 100 feet from the pump. By manually closing the ball valve on the 1/2" air supply to the pump the liquid flow is halted instantaneously. A greater safety factor appears to be inherent in this procedure than that using an electronically activated shut-off on the tank. Not only is the shut-off more positive but it also prevents the buildup of pressure in the supply line to the tank. A description of the Wilden pumps and the pump curves for the M-8 and M-15 pumps are given in the copies of the manufacturer's brochure sheet enclosed.

VII. (a) The fence around the Wastex property is shown on Sketch SK-1 with all gates also noted. This sketch was included as page 25 of the January 12, 1983, submission.

(b) Entrance to the facility is controlled exclusively by the Wastex security personnel. The signs with the legend "Danger - Nonauthorized Personnel Keep Out" will be posted at the entrances to each building where hazardous wastes are stored or treated, at each tank battery used for the storage of hazardous waste, and at each gate allowing access to the facility.

VIII.(a) All required emergency equipment is inspected weekly by the safety Director or his designee. The inspection sheet used for that inspection and the log sheet of the inspections are enclosed. The Safety Director has the responsibility of correcting any deficiencies noted.

(b) A drum becomes suspect when there is a heavy layer of

rust or corrosion on the exterior, severe dents or possible punctures, or other evidence of rough handling such that the capacity of the drum holding the hazardous waste is questionable.

(c) Tank shell thickness will be determined by contract consultants using an ultrasonic thickness measuring device. At some time in the future such a device may be purchased for use by trained Wastex personnel.

(d) That portion of the regulation cited, 264.15, makes no mention of lighting, overhead or otherwise. The storage areas can be safely and properly inspected at this time although a hand held light may be necessary in some areas at some times. Additional lighting is to be installed but no justification or requirement that this be made a part of the permit is evident. Except for buildings 16 and 31, all wiring and fixtures will be explosion-proof and we wish to make certain the installations are cost effective and adequate when installed. This will depend to a great extent upon the storage pattern and use of the buildings allowed under the Part B Permit. Conventional lighting cannot be used in buildings 16 and 31 until the flammable hazardous waste stored there is removed. As new lighting is installed the use of those storage areas will be maximized. The safest method and time for the lighting installation would appear to work this activity in conjunction with and on the same schedule as the sealing of the floors.

(e) The weekly inspection form submitted as page 13 of the January 12, 1983, submission appears to satisfy the requirements of 264.194 (a) (4) and (5).

IX. (a) Removal of any leaking drum will be at the same time

as the cleanup of the resulting spill and any suspect drums in the storage area will be removed using the same time frame from their time of discovery.

(b) The only reason for taking a tank completely out of service would be the discovery of a leak in the tank shell or the potential for a leak or rupture. This potential would be indicated by a drastic loss of metal thickness noted in the annual inspection, observation of a crack opening in the shell or a weld, weeping, or evidence of a leak around the tank where no leak is discernible. Should this be necessary the material in the tank will be transferred as soon as sufficient capacity in other tanks is available. If noted on an off-shift, personnel will be called in to accomplish the transfer. The only alternate service considered would be for the storage of wastewater prior to treatment if the structural integrity was proper to store that material at atmospheric pressure. Other defects, such as plugged vent lines, inoperable pressure/vacuum relief valves, or leaking fittings, will be repaired prior to the completion of the shift on which they are discovered or necessary personnel held over to complete the repairs. Any tank taken out of service and not returned to service for the storage of hazardous waste will be closed as specified in the closure plan.

(c) Tanks to be inspected will be added to the inspection log as they are placed in service.

X. (a) An alarm system will be installed with the plant broken into three main areas with each area having a discrete alarm sound and an overall alarm signal. An alarm button will be mounted outside each major exit from all buildings used for the storage or processing of

hazardous waste. Activating one of those buttons will cause the alarm signal for that area to be sounded throughout the facility. The overall alarm signal can be activated from the main office or from the security office at the main gate. The plant supervisor, the security officer on duty, and main office maintain radio contact via a walkie talkie system. Citizens Band radios in the plant supervisor vehicle, in all semi-tractors, and in the office are used as a back-up.

(b) The Illinois-American Water Company which is the local public water utility has provided data regarding flow and pressure checks at several fire plugs within the facility to the East St. Louis Fire Department and their evaluation is that sufficient water volume and pressure are available for fire fighting. The Fire Department personnel making this evaluation were aware of the types and quantities of materials on-site.

XI. (a) The Landfill Transport Loading Station will be used for the accumulation of material that emanates from the fixation/solidification process. The material will be transferred from the process via a covered conveyor and this storage area will remain covered except for those periods when the material is loaded by a front end loader into trucks for transport to a landfill. The attached sketch, Enclosed Storage for material from Fixation/Solidification Process, shows the station, the cover, and the conveyor in detail. This sketch was used by I.E.P.A. for construction permit issuance.

(b) The final determination of the lighting to be used at the facility will be dependent upon the requirements of the Part B permit and the operations allowed. All con-

tainer storage areas will have lighting sufficient to provide safe placement and retrieval of containers and to allow safe inspection of the storage area and drums stored with minimal use of handheld lighting. Lighting in areas used for the handling, processing, or storage of flammable materials will meet the required NEMA explosion proof rating. Lighting in the area of the storage tanks will be provided to allow a safe working area for the employees and to allow the employees the ability to observe all tank connections, lines, valves, and hoses that are in use for transfer of hazarous waste to or from the tanks. When unloading drums of hazardous waste the dock area will be well lighted but the lift-truck mounted lights will be used in van type trailers during unloading and handheld lighting for drum inspection. Temporary lighting in such a trailer containing flammable materials does not appear to be a safe or feasible consideration.

(c) The prevention of hazards in unloading hazardous materials in drums is stated with the inspection of the drums. This is accomplished prior to unloading if transport is by Wastex equipment and prior to unloading and during unloading whether transported by Wastex or another transporter. Leaking or suspect drums or drums that the driver cannot approve as meeting the appropriate standard will not be accepted for transport by Wastex vehicles. Any such drums arriving at Wastex will be placed in protective overpacks or the contents transferred to another container. They will not otherwise be placed in storage.

The unloading of drums will be accomplished by trained operators using lift trucks of the proper size and capacity in good working order. The lift truck will be equipped with a dual drum lifter in good working order. Drums of possibly incompatible

materials will not be unloaded at the same time on the same dock. Drums will be unloaded at the dock closest to the area in which they will be stored or processed. Drums removed from a trailer will not be left on the dock but will be taken down a ramp into a holding area with secondary containment for identification of the material and the manifest information verified. Upon completion of this verification and an additional drum inspection the drums will be moved to the proper processing or storage location.

(d) Operations of the facility except for the unloading of drums will not continue during a power outage This operation will continue using lift-truck provided lighting and hand held lights to assure that all drums at the facility are held in an area having secondary containment. All bulk transfer, treatment, or blending processes will be halted due to the use of electrically powered equipment and control systems or of compressed air provided by an electrically driven compressor. All tanks and process equipment are provided with safety relief valves and should pressures build up the excess will be vented to the atmosphere outside the buildings. Restart of the operations will not be initiated until the resealing of such valves has been verified.

Upon loss of power to the facility all equipment in operation will be shut down by the operator and the plant supervisor will be responsible for shutting down the central air compressor and the boilers. It will be the joint responsibility of the plant supervisor and the maintenance supervisor to verify the cause and length of any

power outage and the starting of any process halted by a power outage shall be under the direct supervision of the plant supervisor.

(e) The facilities for the storage of flammable materials have been inspected by inspectors of the Illinois State Fire Marshal's Office particularly with regard to the ventilation of fumes and vapors. We have submitted information to that office verifying the compliance of such areas with the regulations of the State Fire Marshal concerning ventilation requirements and no further requests have been made for information or compliance activities. No fumes or vapors are anticipated from the storage or handling of corrosive hazardous waste. Organic vapor respirators have been issued to each plant worker with instructions that they be used if any accumulation of fumes or vapors are observed in their work area. Should a self-contained breathing apparatus be necessary, two Scott Air-Paks are provided in a central location. Normal operations will be halted in any area in which such units would be required and only those activities necessary to prevent or alleviate a hazardous situation will be allowed. Inspection of work areas for depletion of oxygen will be accomplished by using a Sentox 2 Portable Gas Detection and Alarm System manufactured by Bacharach Instrument Company.

XII. (a) "No Smoking" signs have been mounted at each entrance to every building in which flammable hazardous waste could be stored, handled, or processed.

(b) No welding, flame cutting, or other use of equipment not meeting the requirements of the applicable N.E.M.A. standards for being explosion proof will be allowed

until the area has been sampled using the Sentox 2 system noted above with regard to the presence of flammable fumes or vapors. The Sentox 2 system will be used to monitor the levels continuously during the time such activity is taking place and that activity will be halted immediately if the Sentox 2 system alarm is sounded.

XIII.(a) The only incompatible wastes to be mixed at the facility will be those mixed in the acid/alkaline mixing tank for the purposes of neutralization. These materials will be aqueous solutions and the mixing of such solutions can be accomplished without the generation of extreme heat or pressure and without danger to the structural integrity of the mixing tanks by closely monitoring the pH of the materials to be mixed and the resultant mix and the temperature of the solution in the tank and carefully metering the flow of materials into the mixing tanks. With the resulting solution being an aqueous solution any mists, fumes, or gases generated will remain in the solution as a result of the temperature control.

XIV. (a) Buildings 3 and 22 and building 38 are the buildings where containers of ignitable hazardous waste will be stored where the storage or working area may be within 50 feet of the property line. Buildings 3 and 22 have masonary walls with roofs of precast concrete supported by a steel structure. There is also a buffer area between the building wall and the chain-link fence near the property line. The adjacent property is railroad right-of-way and pass through by unauthorized personnel is minimal. Containers will not be stored adjacent to the wall as that area will be a lift-truck aisleway.

Building 38 is an all steel building and a fence is also provided at the property line. The area inside the building adjacent to the wall near the property line is composed of ramps from the truck dock and from grade. The only drums that will be stored in this area are those that are scheduled to be pumped off in a short time and storage will be minimal. Longer term storage of drums will be in buildings 3 and 22.

XV. (a) The only analyses required for the management of incompatible waste are those normally required for the hazardous wastes to be permitted. No additional analyses will be required.

(b) The only known or anticipated incompatibilities between hazardous wastes at the site will be that between alkaline and acidic corrosive wastes and the potential for incompatibility between corrosive hazardous wastes and some ignitable hazardous wastes. Storage of these wastes will be in seperate buildings with each building having a discrete secondary containment system. Bulk storage of these materials will be in dedicated tanks and tanks containing one type of waste will have a containment area seperate from tanks containing incompatible waste.

The unloading and transfer of drums of incompatibles will not occur at the same time. Drums of one type will be unloaded, inspected and evaluated, and transferred to the appropriate processing or storage area before unloading of drums of an incompatible waste is initiated.

(c) Hazardous wastes containing cyanide will not be pumped over containers of acidic material. Wastes containing cyanide will be handled or stored as an alkaline

corrosive hazardous waste to prevent co-mingling with acidic materials. The only pumping provided for this materials is from drums into the acid/alkaline mixing tank or the fixation/solidification process or from a bulk storage tank, one of the AAT tanks, into one of those two processes.

XVI. (a) Compliance with the buffer zone requirements specified by 264.198 (b) is demonstrated by review of Drawing P-5 with Drawing P-7.

XVII.(a) Compliance with 264.17 (b) is discussed under item XIII. The tank to be installed will be a glass-lined steel tank. The glass lining will minimize degredation of the tank and provide for easier cleaning between batches.

XVIII. A revised Contingency Plan for the facility is attached.

XIX. (a) An outline of the Employee Training Program is attached. For new employees this material is covered in a three day classroom session of lectures and discussion. An annual review of this material is required of each employee. Small groups will be scheduled for a one day survey session with the areas of deficiency for any of those employees highlighted during that day. Should any severe problems be noted additional days will be scheduled in the 30 days after the initial day for more intensive review.

(b) A copy of the resume of the Training Director, Joe D. Burroughs, is attached. We feel that the education and experience of Burroughs is more than adequate to meet the requirements of 264.16(a)(2).